

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

NATIONAL ASSOCIATION FOR GUN  
RIGHTS, INC., *et al.*,

Plaintiffs,

v.

MERRICK GARLAND, IN HIS  
OFFICIAL CAPACITY AS ATTORNEY  
GENERAL OF THE UNITED STATES,  
*et al.*,

Defendants.

Case No. 4:23-cv-00830-O

**DECLARATION OF DANIEL HOFFMAN**

1. I am the Chief of the Firearms Technology Industry Services Branch (FTISB) and a Firearms Enforcement Officer (FEO) at the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been in my current role for the past two years and employed with the Firearms & Ammunition Technology Division (FATD) since January 2016.
2. I base this declaration on my personal observations and experience, as well as documents and information provided to me in the ordinary and regular course of business.
3. Defendants have submitted via mail two videos to the Court. Both videos show tests conducted by ATF; one by a former Firearms Enforcement Officer (FEO) and the other by an Attorney Advisor as part of the classification of the Rare Breed

Triggers, LLC FRT-15. Both videos show a standard AR-15 rifle equipped with a Rare Breed Triggers, LLC FRT-15 trigger.

4. The first video shows a test conducted on June 11, 2021. In this video, the FEO installed a zip-tie around the rear of the grip and front of the sample's trigger. The zip-tie was gradually tightened until the trigger was retracted just enough to initially release the hammer. The weapon is then loaded, the bolt carrier pulled to the rear, then released; the weapon fired automatically without the trigger being released, *i.e.*, it continued firing as long as continuous pressure was applied to the trigger. This test demonstrates that a firearm equipped with an FRT-15 is capable of firing more than one round of ammunition automatically with a single function of the trigger.
5. The second video shows a test conducted on December 2, 2022. In this video, the FRT-15 is installed. The shooter pulls the trigger and the weapon cycled and fired automatically without the trigger being released, *i.e.*, it continued firing as long as continuous pressure was applied. This test demonstrates that a firearm equipped with an FRT-15 is capable of firing more than one round of ammunition automatically with a single function of the trigger.

I declare under penalty of perjury pursuant to 18 U.S.C. § 1746 that the foregoing is correct and true to the best of my knowledge.

DATED: September 6, 2023

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DANIEL HOFFMAN  
Chief, Firearms Technology Industry  
Services Branch